Registration Authority (RA) Smartcards Policy

Solent NHS Trust policies can only be considered to be valid and up-to-date if viewed on the intranet. Please visit the intranet for the latest version.

Purpose of Agreement	This policy applies to all directly and indirectly employed staff who are involved in the RA Process and have been issued a Smartcard for accessing NHS Digital applications, in line with the Trust's Equal Opportunity Policy.
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Amendments Summary:

Amend No	Issued	Page	Subject	Action Date
		All	Check and update all links throughout the document	December 2012
		15	Update Trust RA Agent contact details	December 2012
		14	Include RiO Downtime Viewer Procedure	January 2012
		14	Update Solent RA Agent telephone numbers	January 2014
		14	Updated as per review date	February 2017
4		All	Updated as per review date	March 2020

Review Log:

Version Number	Review Date	Lead Name	Ratification Process	Notes
2.1	December 2012	Jackie Thomas Information Governance Co-ordinator	Information Governance Steering Sub-Committee (Mar 13) NHSLA Policies Group (Mar 13)	• Update Trust RA Agent contact details • Check and update all electronic links • Include RiO Downtime Viewer Procedure • General review
2.2	January 2014	Jane Thorn RA Administrator	Policy Group	• Up-dated Names and Titles. • Up-dated Processes • Moved Glossary of Terms • General review
2.3	November 2016	Glen Wale Head of Information Systems	Policy Group	• Revised terms
2.4	March 2017	Glen Wale Head of Information Systems	Policy Group	• Updated hyperlinks
4	March 2020	Glen Wale Head of Information Systems	Policy Group	• Updated Contact details • Updated Processes • General Review

SUMMARY OF POLICY

For Healthcare Professionals to access NHS Digital Spine enabled applications they need to be registered. The registration process for the National Programme has to meet the current Government requirements and will be applied nationally.

All NHS Digital Spine enabled applications use a common security and confidentiality approach. This is based upon the NHS professionals, organisation/s role/s or Position/s, area/s of work and business function.

The primary method by which users will be enabled to access an NHS Digital application is via a Smartcard issued during the Registration Process. Once an applicant has been successfully registered they will have a Smartcard – which will permit their access to the appropriate application/s and information.

The process of gaining access to these Spine enabled applications is called Registration Authority Programme Registration. The Registration Process is operated at a local level by a Registration Authority who is required to conform to the National Registration Policy and Practices identified below.

Employees working across NHS Organisations will use the same Smartcard at their different work locations for their different Positions. Access for each organisation and each Position will be determined by the local organisations Sponsor. Similarly, if an employee leaves to join another NHS organisation, access on their Smartcard will be revoked, the card retained by the user and access reinstated by the new NHS organisation.

This document describes the policy for the operation of the Registration Authority (RA) within Solent NHS Trust (hereafter known as the Trust).Where services are contracted or part of an agreement, then adequate provision for the necessary compliance with RA requirements needs to be made in the contract/agreement.

The Trust has set up a Registration Authority to manage the distribution and use of Smartcards. The Trust will comply fully with the latest published National Policies and Procedures identified in the following documents:

- Registration Authorities Operational Process Guidance available from: https://digital.nhs.uk/services/registration-authorities-and-smartcards

- The NHS Confidentiality Code of Practice https://www.gov.uk/government/publications/confidentiality-nhs-code-of-practice

- National Registration Authority Policy: https://digital.nhs.uk/services/registration-authorities-and-smartcards

- Privacy notice to smartcard users on the use of data - Terms and Conditions https://digital.nhs.uk/services/registration-authorities-and-smartcards/privacy-notice-to-smartcard-authorised-device-users-on-the-use-of-your-personal-data

- NHS Employers' identity check standards http://www.nhsemployers.org/your-workforce/recruit/employment-checks/identity-checks

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REGISTRATION AUTHORITY SMARTCARDS POLICY

1. INTRODUCTION & PURPOSE

1.1 NHS Digital will improve the use of IT in the NHS to provide greater benefit to both patients and clinicians, working towards a vision of being paperless by 2023.

1.2 As part of this programme the NHS has deployed several Spine compliant systems. These provide a live, interactive patient record system accessible 24 hours a day, seven days a week, by health professionals working across all health and social care sectors.

2. SCOPE & DEFINITIONS

2.1 This policy applies to all directly and indirectly employed staff who are involved in the RA Process (whether as a User of NHS Digital applications, a Sponsor, a Registration Authority Agent, Human Resource Dept, IT Services Dept or the Registration Authority Manager) and have been issued a Smartcard for accessing NHS Digital applications, in line with the Trust's Equal Opportunity Policy.

2.2 Under the terms of this policy, GP Practices, and other independent practitioners for whom Solent NHS Trust has produced Smartcards and holds RA Forms, are also accountable to the Solent NHS Trust Registration Authority Manager.

2.3 This policy must be read in conjunction with all relevant Solent policies and documents on the Trust's Intranet.

3. PROCESS/REQUIREMENTS

3.1 The Trust will ensure that processes supporting the identification, registration and management of staff will be integrated with other Trust processes as appropriate (for example, the Trust starters and leavers processes and the Trust Disciplinary Procedure).

4. ROLES & RESPONSIBILITIES

4.1 The Registration Authority

4.1.1 The Registration Authority (RA) is an official or committee within the Trust with appropriate organisational authority responsible for ensuring that all aspects of registration services and operations are performed in accordance with National Policies and procedures.

4.1.2 They are responsible for providing arrangements that will ensure tight control over the issue and maintenance of electronic Smartcards, whilst providing and efficient and responsive service that meets the needs of the users.

4.1.3 The Registration Authority (RA) has the following responsibilities:-

- Ensuring that the National Registration processes are adhered to as stated in Registration Authorities Operational Process and Guidance and this document

• The Care Identity Service (CIS) is an electronic system for registering and issuing smartcards, the above CIS forms are a post go-live contingency process for Registration Authority (RA) staff in the event of CIS not being used. RA staff will need to enter the information from the forms in CIS

• Ensuring that any local processes developed to support the National Registration processes are adhered to in full;

• Ensuring that there is sufficient availability of resource to operate the registration processes in a timely and efficient manner to meet the organisational responsibilities;

• Ensuring that the RA team members are adequately trained and familiar with the local and national RA processes;

• Ensuring that an indexed and secure audit trail is maintained of:

- Applicants Registration Authority (RA) information (RA01) (Care Identity Service spine application);
- Profile changes and lost, damaged card (Care Identity Service spine application);
- Change profile for fall back card (Care Identity Service spine application);
- To change personal details, (Care Identity Service spine application);
- To change the access profile associated with a position (Care Identity Service spine application);
- To change the access profile associated with a template, (Care Identity Service spine application);
- To support the management of RA Admin links e.g. Organisational Restrictions, (Care Identity Service spine application);
- RA09 is designed to support the creation of the self-service fallback smartcard **not used in Solent**. Temporary access will be provided in exceptional circumstances to Clinical system if required via username and password.

• Ensure RA members are familiar with and understand Registration Policy and Practices for GPG45 ID the Registration Authorities Setup and Operation and this document

• Ensure Sponsors are familiar with and understand - User Registration - Sponsor Training available from:

https://digital.nhs.uk/Registration-Authorities-and-Smartcards/Registration-Authority-training

or via ESR elearning:

000 National Registration Authority and Smartcard Policy

• To ensure sponsors identified via the Executive have the business function of “sponsor” associated with the appropriate organisation job profile/s;

Notification of the creation and revocation of RA managers (including their e-mail address) by sending an e-mail to ***ramanagers.agents@nhs.net***

4.1.4 All Trust RA Members will have sufficient training to carry out their RA tasks in accordance with National Policies and Procedures.

4.1.5 They will be individuals capable of trust as they will be handling sensitive information covered by The Data Protection Act. They will be key players in ensuring the NHS Code of Confidentiality is followed.

4.1.6 The Trust Registration Authority is made up of the following personnel:

- Registration Authority Manager
- Caldicott Guardian
- Registration Sponsors
- Registration Agents – ID checkers, Basic and Advanced
- Card un-lockers

4.2 Registration Authority Manager

4.2.1 The Trust RA Manager is selected by the Trust Executive and is responsible for the set up and day to day running of the Trust RA service, including ensuring that RA processes are implemented and maintained within independent practitioner premises.

4.2.2 The Trust RA Manager for Solent NHS Trust is the Head of Information Systems

4.2.3 The RA Manager must ensure that all RA procedures are carried out in accordance with local and National policy.

4.2.4 RA Managers will report significant incidents to the Head of Information Governance, ICT Committee Board and Trust Board as per section 6, Incident Reporting.

4.2.5 The RA Manager will;

- Assign, sponsor and register RA Agents (where permitted under the governance arrangements), ensuring there are sufficient resources to operate the RA process in a timely and efficient manner to meet the organisations responsibilities
- Maintain and make available to RA Agents a list of active RA Sponsors any restrictions, to assist with the registration of users and processing of RA requests.
- Ensure that all RA Agents are adequately trained and familiar with the local and National policies and processes. Training records will be maintained and held by the Information Systems team.
- Ensure that all Sponsors are trained in their responsibilities and where appropriate are familiar with the process of unlocking Smartcards.
- Assist Sponsors in their understanding of the PBAC model and direct them to information relating to the applications they sponsor users to access.
- Identify areas where the local business processes need updating to improve alignment with RA requirements
- Implement audit procedures and identify a secure location for electronic correspondence of all registration and associated information in accordance with the Data Protection Act. This includes RA Manager, Agent and Sponsor assignments, all RA requests and inter-organisation agreement documents. All electronic documentation will be held in accordance with the stipulated retention period.

- Ensure that the National Registration Policy & Processes (as identified in this document and the Registration Policy and Practices for *GPG45) are adhered to in full and that any local processes support the National policy and processes;
- Ensure adherence to the Fallback Smartcards procedure **this is not to be used.** Temporary access will be provided in exceptional circumstances to Clinical system if required via username and password.
- Be the central point of contact for RA related security incidents and arrange for replacement cards to be produced as necessary. Incidents forms are completed by the user and sent to the Risk Manager, who then informs the Registration Authority Manager. The Registration Authority Manager will then inform the Senior Information Risk Owner and Caldicott Guardian of any significant security breaches and log risks as appropriate.
- Disseminate National RA information to interested parties as appropriate
- Ensure that there is a sufficient supply of Smartcards and Smartcard hardware for the organisation and communicate technical requirements to CGI
- Register any delegate RA Manager(s) who have appropriate letters of assignment from organisations;
- Register RA Agent(s) who meet the local information governance criteria and ensure that they are aware of their responsibilities and
- Observe the same responsibilities as the RA Agent when performing their RA duties.

4.3 Registration Authority Agents

4.3.1 RA Agents are appointed by the Trust RA Manager.

4.3.2 RA Agents within Solent NHS Trust are likely to be Team Administrators, or other nominated staff. RA Agents within GP Practices are the Practice Manager (plus one other). A list of registered Solent NHS Trust RA Agents will be maintained on the Trust intranet site. (GP practices and other independent practitioners including pharmacists etc should maintain and circulate their own contact lists).

4.3.3 The role of each RA Agent is to:

- Be familiar with all relevant National RA documentation
- Ensure that all users (RA and non-RA) are registered and issued with a Smartcard containing a UUID and their photograph.
- Carry out the process by which Locum, Agency and Bank staff gain access to (Care Identity Service spine applications) Adhere to the Audit procedure and ensure that all RA documentation and associated information are maintained and securely stored according to National Policy with the Solent NHS Trust RA Manger.
- Promptly report all incidents of misuse, anomalies or problems to the RA Manager and initiate local Risk Management procedures.
- Apply common sense checks and challenge the content of RA requests checking that:
  - The registration request is from a recognised Sponsor from their own organisation or one with which a formal, approved inter-organisational agreement exists.
  - Appropriate sponsorship has been applied e.g. a Modern Matron has not sponsored the registration of a GP (unless they have been requested to do so) or that clinical activities have not been requested for Administration and Clerical staff.
  - Ensure clinicians requesting registration under their maiden name have appropriate legal proof of their identity ie birth certificate

- Ensure in accordance with the organisations Fallback Smartcard Usage procedure Fallback smartcards are not currently used in Solent.

4.4 Sponsors

4.4.1 Sponsors are appointed and entrusted to act on behalf of Solent NHS Trust Chief Executive in determining who should have what access and maintaining the appropriateness of that access.

4.4.2 Sponsors are responsible for making sure that National application users are given the minimum appropriate level of access needed to perform their job.

4.4.3 Sponsors will be registered by the RA Manager and are required to provide documentary evidence to prove their identity.

4.4.4 Sponsors within Solent NHS Trust are any individual with line management responsibilities for NHS Digital application Users. Sponsors within GP Practice are the Partner/Lead GP. A list of registered Sponsors will be maintained on the Trusts intranet. (GP practices and other independent practitioners including pharmacists etc should maintain and circulate their own contact lists).

4.4.5 They have the following responsibilities:-

- Sponsor user registrations within the area of responsibility and within their own organisation unless there is a formal, documented, inter-organisational agreement in place.
- As directed by the organisation, undertake an appropriate level of training to carrying out their Sponsor role. Training records will be maintained and kept by the RA Manager.
- Ensure they understand the *PBAC Database* and any application based PBAC material published on the NHS Digital Implementation website; and the implications of granting the job roles and activities defined within. Sponsors are given a list of assignable positions at the time of appointment for their area of work only

- Maintain appropriate access to Care Identity Service spine applications for users within their area of responsibility which is consistent with the NHS Confidentiality Code of Practice. This will include adding/removing access profiles and instigating the revocation of Smartcards/Smartcard certificates where required by emailing the Registration Authority
- Be aware and familiar with the briefing material provided by the application providers relating to the applications they will be sponsoring users' access for.

4.4.6 Sponsors may also:

- Unlock Smartcards /reset Logon Passcodes and renew non expired certificates for healthcare professionals/workers when required (and where trained)
- Where required, manage the distribution of Fallback Smartcards, **not used in Solent**.

4.4.7 Registration Sponsors are responsible to the RA Manager for the accuracy of the information in RA requests

4.5 Bureau/Printing Station

4.5.1 Managers or HR to contact the trust RA agents to issue staff with smart cards

4.6 Line Managers

- To identify all roles within their area of responsibility which require access to the system and ensure that all employees, including temporary/agency/bank and locum employees, are provided with appropriate access.
- To ensure for all roles that involve access to the system that job descriptions and any recruitment materials make reference to the need to be registered and the role's responsibilities in relation to using the system.
- To ensure that current/future employees attend the appropriate meetings with a member of the RA office to enable the Smartcard to be issued, providing employees with authorised time away from the department where applicable.
- To ensure that all new starters within their area of responsibility, including agency/temporary employees, receive training in order to be able to access the system.
- To ensure that all employees are aware of the contents of this policy and their responsibilities in relation to use of and access to the system.
- To immediately inform the Sponsor, and in the absence of the Sponsor the RA office, of any leavers, starters and staff changes.

To ensure revocation of smartcard permissions, for example where there is failure of notification from the immediate line manager of a leaver; the Information Systems team will conduct the following:

1. Information Systems Analyst to run the Leavers report from ESR on the first Monday of each month;
2. Log into the Card Identity System and "end date" the Solent positions only – as per the leaving date;
3. The Information Systems Configuration Team will ensure access to all other non-Spine compliant systems e.g. R4 and Inform are revoked;

Those staff identified as returning to Solent e.g. Flexi-Retired or on Maternity, PBAC permissions will be temporarily suspended in the period of absence. It may be a requirement to be re-trained upon the individuals return.

4.7 Employees

- To ensure that he/she uses his/her Smartcard responsibly and in line with his/her access rights.
- To ensure he/she informs the Sponsor (who in turn must inform the RA Agent) immediately should his/her Smartcard be lost, stolen or misplaced. An incident must be raised https://v-sfg-001.solnhs.local/safeguard/index.aspx?sid
- To ensure that he/she reports any misuse of the system in line with this policy.
- To ensure that he/she keeps his/her Smartcard and log-in details confidential. In particular he/she must not leave his/her PC logged in and unattended; must not leave Smartcards unattended; must not share or provide access to his/her Smartcards or passwords.
- Any breach of the above could lead to action being taken in line with the Trust's Disciplinary Policy.

- To ensure that he/she accurately completes the necessary paperwork, provides suitable identification and attends any appropriate appointments in order to register on the system or have his/her Smartcard updated/re-issued.

5. RA SUPPORT

5.1 Staff members should register for Self-Service portal on the link provided - https://portal.national.ncrs.nhs.uk/portal/ - to unlock smart cards themselves in the first instance. If they are not able to resolve the issue then they should contact Smartcard unlockers or RA agents in their locality or Clinical /Office base. If the issue is not resolved then they should log a call with Information Systems on MyIT Portal/with CGI. The list of RA agents can be found on SolNet on the following link: http://intranet.solent.nhs.uk/TeamCentre/InformationSystems/Smartcards/TeamDocument/Card%20unlockers%20and%20Solent%20RA%20staff%20list.xlsm?Web=1

5.2 For Smartcard recertification issues, staff should contact the local RA agents on the link above. If they are not able to help then a call should be logged with Information Systems on MyIT Portal/with CGI.

5.3 For lost smartcards a call should be logged with Information Systems on MyIT Portal/with CGI and an incident raised. The incident reference number should be provided to the Information systems team for their records when producing a new smart card.

5.4 For damaged cards the staff members should log a call with Information Systems on the MyIT portal /with CGI.

6. INCIDENT REPORTING

6.1 Incidents may be reported by any member of staff where they feel that there is a risk to patient health, confidentiality or Trust reputation.

6.2 Incidents should be reported, using the Solent NHS Trust Incident Reporting Procedure and sent to the Trust Risk Manager (who will then inform the RA Manager). In the case of any RA incidents occurring at independent contractor sites for which the Trust has produced Smartcards and holds RA forms etc, the Solent NHS Trust RA Manager should be made aware of the incident and will instigate the appropriate action as necessary. The Registration Authority Manager will report serious incidents to the ICT Committee Board.

6.3 Examples of incidents are:

- Smartcard or application misuse.
- Smartcard theft
- Non-compliance of local or national RA policy.
- Any unauthorised access of NHS Digital applications.
- Any unauthorised alteration of patient data.

6.4 The RA Manager will consider all incidents reported to them. Any incidents considered significant will be escalated to the Information Security Managers within the relevant service provider (CGi) and/or HR and the Caldicott Guardian (depending on the nature of the

incident). A major breach of security will also be reported by the RA Manager to NHS Digital to ensure any risks resulting from the event can be taken into account and mitigated against.

6.5 A significant incident is an isolated incident or a series of less significant incidents that could lead to a serious degradation of healthcare or information security. The Trust Board and Caldicott Guardian will consider incidents reported to them and decide whether Trust systems or working practices should be reviewed as a result.

6.6 Incidents involving breaches of security or that demonstrate that a User may not be considered trustworthy should also be advised to HR and Caldicott Guardian by the RA Manager so that any disciplinary measures required may be taken. HR will decide which other members of staff need to be involved (e.g. Line Manager, IT Manager).

7. LOCAL DOWNTIME AND LEGACY SYSTEM VIEWERS

7.1 There are likely to be times when National Applications are unavailable for short periods of time to enable upgrades and maintenance on the system.

7.2 An historic RiO and TPP SystmOne viewer has been developed to provide access to "essential" information not available during these times. Access to the viewer will only be made available to staff that have an existing appropriate PBAC permission on their Smartcard. New Starters would not be given access until they are in receipt of a registered Smartcard.

7.3 The Viewer procedure is part of the Standard Operating Procedure for Mental Health and Community Health instances and can be located on Solent intranet.

8. TRAINING

8.1 Once the applicant is issued with a smartcard the user is provided with Login details. To access generic application training (ESR, TPP, SCR, etc) the user is required to contact the appropriate department through their line manager, access to these systems will not be given until training has been provided.

9. EQUALITY IMPACT ASSESSMENT AND MENTAL CAPACITY

9.1 There is no negative impact on the protected characteristics and the Quality Impact Assessment, that can be found in appendix – A of this policy.

10. SUCCESS CRITERIA / MONITORING EFFECTIVENESS

Monitoring the Effectiveness of this Policy

10.1 The effectiveness of this policy will be monitored by the following methods;

- Reports to the Solent NHS Trust ICT Committee Board
- Number and severity of incidents relating to RA
- Audits relating to issuing/management and use of Smartcards, storage of RA /information and the security of RA equipment and supplies

11. REVIEW

11.1 This document may be reviewed at any time at the request of either staff side or management, but will automatically be reviewed 3 years from initial approval and thereafter on a triennial basis unless organisational changes, legislation, guidance or non-compliance prompt an earlier review.

12. RA AGENTS

The Trust RA Agents who can issue smartcards are:

Information Systems
InformationSystems@solent.nhs.uk
023 810 30026

13. REFERENCES AND LINKS TO OTHER DOCUMENTS

- Solent NHS Trust Connecting for Health -Registration Authority Procedures Manual
- Solent NHS Trust Information Security Policy
- Solent NHS Trust Data Protection, Caldicott & Confidentiality Policy & Procedures
- Solent NHS Trust Information Governance Policy
- Solent NHS Trust Information Governance Strategy
- The NHS Confidentiality Code of Practice
- Solent NHS Trust Sponsor Briefing –User Registration Guidance for Issuing Smartcards
- Smartcards – An Information Guide for Staff
- Solent NHS Trust Disciplinary Policy
- Solent NHS Trust Incident Reporting Procedure
- Internal documents can be found on the Trust Intranet
- Medical Records Code of Practice
- Solent NHS Trust Standing Operating Procedure for Mental Health & Community Health Instances of TPP SystmOne

14. GLOSSARY

Term	Acronym	Definition
Registration Authority	RA	Any entity that is appointed by the Executive of a legal NHS organisation as being responsible for the identification and authentication of applicants for the use of NHS Digital systems
RA Manager	RAM	Manages the RA service provision and operation to meet the needs of an organisation and all its users. Additionally the RA Manager is responsible for briefing and registering RA agents.

RA Agent	RAA	Administers the RA function under the direction of the RA manager, responsible for performing registration and maintenance of sponsors and healthcare professionals in the organisation (or other organisations if inter-organisation agreements exist). Ensures that the National and local RA processes are followed
Sponsor	Sponsor	The individual identified by the organisations Executive who has been appointed to designate and approve access to information and functionality of NHS Digital systems via the selection of the appropriate PBAC codes.
User	User	Individuals who will access NHS Digital applications according assigned roles, responsible for using system functionality and information securely and responsibly according to agreed policies and procedures
Spine User Directory	SUD	The NHS Digital system which stores user access details, including roles, for national NHS Digital systems.
Care Identity Service	CIS	The NHS Digital system which stores user details and enables production and management of Smart Cards.
Role Based Access Control	RBAC	The means by which NHS staff are identified by their job functions. This in turn dictates the type of access that they are granted to NHS Digital applications.
Position Based Access Control	PBAC	The replacement to RBAC. The means by which NHS staff are identified by their job positions. This in turn dictates the type of access that they are granted to NHS Digital applications.
NHS Care Records Service	NCRS	Historic system where information is stored and accessed
Identification	ID	Documents required to prove the identity of the smartcard applicant

Appendix: A **Equality Impact Assessment**

Equality Analysis and Equality Impact Assessment

Equality Analysis is a way of considering the potential impact on different groups protected from discrimination by the Equality Act 2010. It is a legal requirement that places a duty on public sector organisations (The Public Sector Equality Duty) to integrate consideration of Equality, Diversity and Inclusion into their day-to-day business. The Equality Duty has 3 aims, it requires public bodies to have due regard to the need to:

- **eliminate unlawful discrimination**, harassment, victimisation and other conduct prohibited by the Equality Act of 2010;
- **advance equality of opportunity** between people who share a protected characteristic and people who do not;
- **foster good relations** between people who share a protected characteristic and people who do not.

Equality Impact Assessment (EIA) is a tool for examining the main functions and policies of an organisation to see whether they have the potential to affect people differently. Their purpose is to identify and address existing or potential inequalities, resulting from policy and practice development. Ideally, EIAs should cover all the strands of diversity and Inclusion. It will help us better understand its functions and the way decisions are made by:

- **considering the current situation**
- **deciding the aims and intended outcomes of a function or policy**
- **considering what evidence there is to support the decision and identifying any gaps**
- **ensuring it is an informed decision**

Equality Impact Assessment (EIA) *see supporting guidance on pg 3*

Step 1: Scoping and Identifying the Aims

Service Line / Department	Corporate service / Finance and Performance	
Title of Change:	Updated Policy	
What are you completing this EIA for? (Please select):	Policy	*(If other please specify here)*
What are the main aims / objectives of the changes	Update policy	

Step 2: Assessing the Impact

Please use the drop-down feature to detail any positive or negative impacts of this document /policy on patients in the drop-down box below:

Protected Characteristic	Positive Impact(s)	Negative Impact(s)	Action to address negative impact: *(e.g. adjustment to the policy)*
Sex	N/A	N/A	None
Gender reassignment	N/A	N/A	None
Disability	N/A	N/A	None
Age	N/A	N/A	None

Sexual Orientation	N/A	N/A	None
Pregnancy and maternity	N/A	N/A	None
Marriage and civil partnership	N/A	N/A	None
Religion or belief	N/A	N/A	None
Race	N/A	N/A	None

If you answer yes to any of the following, you MUST complete the evidence column explaining what information you have considered which has led you to reach this decision.

Assessment Questions	Yes / No	Please document evidence / any mitigations
In consideration of your document development, did you consult with others, for example, external organisations, service users, carers or other voluntary sector groups?)	No	
Have you taken into consideration any regulations, professional standards?	Yes	NHS Digital – Registration Authority policy
In drafting your document have you identified any discrimination issues, and if so how have they been mitigated?	No	

Step 3: Review, Risk and Action Plans

How would you rate the overall level of impact / risk to the organisation?	Low	Medium	High
	■	☐	☐
What action needs to be taken to reduce or eliminate the negative impact?	N/A		
Who will be responsible for monitoring and regular review of the document / policy?	Registration Authority Manager		

Step 4: Authorisation and sign off

I am satisfied that all available evidence has been accurately assessed for any potential impact on patients and groups with protected characteristics in the scope of this project / change / policy / procedure / practice / activity. Mitigation, where appropriate has been identified and dealt with accordingly.

Equality Assessor:	*Glen Wale*	*Date:*	*28/02/2020*

This section is to be agreed and signed by the Head of Diversity and Inclusion in agreement with the Diversity and Inclusion Strategy Lead:

Diversity and Inclusion authoriser name:	
Date:	

Additional guidance

Protected characteristic		Who to Consider	Example issues to consider	Further guidance
1	**Disability**	A person has a disability if they have a physical or mental impairment which has a substantial and long term effect on that person's ability to carry out normal day today activities. Includes mobility, sight, speech and language, mental health, HIV, multiple sclerosis, cancer	• Accessibility • Communication formats (visual & auditory) • Reasonable adjustments. • Vulnerable to harassment and hate crime.	Further guidance can be sought from: Solent Disability Resource Group
2	**Sex**	A man or woman	• Caring responsibilities • Domestic Violence • Equal pay • Under (over) representation	Further guidance can be sought from: Solent HR Team
3	**Race**	Refers to an individual or group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.	• Communication • Language • Cultural traditions • Customs • Harassment and hate crime • "Romany Gypsies and Irish Travellers", are protected from discrimination under the 'Race' protected characteristic	Further guidance can be sought from: BAME Resource Group
4	**Age**	Refers to a person belonging to a particular age range of ages (eg, 18-30 year olds) Equality Act legislation defines age as 18 years and above	• Assumptions based on the age range • Capabilities & experience • Access to services technology skills/knowledge	Further guidance can be sought from: Solent HR Team
5	**Gender Reassignment**	" The expression of gender characteristics that are not stereotypically associated with ones sex at birth" World Professional Association Transgender Health 2011	• Tran's people should be accommodated according to their presentation, the way they dress, the name or pronouns that they currently use.	Further guidance can be sought from: Solent LGBT+ Resource Group
6	**Sexual Orientation**	Whether a person's attraction is towards their own sex, the opposite sex or both sexes.	• Lifestyle • Family • Partners • Vulnerable to harassment and hate crime	Further guidance can be sought from: Solent LGBT+ Resource Group
7	**Religion and/or belief**	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs, including lack of belief (e.g Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition. (Excludes political beliefs)	• Disrespect and lack of awareness • Religious significance dates/events • Space for worship or reflection	Further guidance can be sought from: Solent Multi-Faith Resource Group Solent Chaplain
8	**Marriage**	Marriage has the same effect in relation to same sex couples as it has in relation to opposite sex couples under English law.	• Pensions • Childcare • Flexible working • Adoption leave	Further guidance can be sought from: Solent HR Team
9	**Pregnancy and Maternity**	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In non-work context, protection against maternity discrimination is for 26 weeks after giving birth.	• Employment rights during pregnancy and post pregnancy • Treating a woman unfavourably because she is breastfeeding • Childcare responsibilities • Flexibility	Further guidance can be sought from: Solent HR team